

28-9211-00-5

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

EDWARD F. WEINBERG, ILYNE R.)	
WEINBERG,)	
)	
Plaintiff(s))	No. 08 C 663
)	
v.)	Judge: HOLDERMAN
)	Magistrate Judge Keys
FIRST FRANKLIN FINANCIAL CORP.,)	
FLAGSHIP MORTGAGE CORP.,)	
Defendant(s))	

MOTION FOR EXTENSION OF TIME

NOW COMES the Defendant, Flagship Mortgage Corp. by and through their attorneys, JOHN M. HYNES, PAIGE M. NEEL and CLAUSEN MILLER P.C. and moves this Honorable Court for an extension in which to answer or otherwise plead to Plaintiffs' Complaint, up to and including March 21, 2008. In support thereof, Defendant states as follows:

1. Counsel for Defendant was recently retained and additional time to investigate this matter and prepare responsive pleadings is necessary.
2. This motion is not brought for the purpose of delay, but to properly prepare responsive pleadings.

WHEREFORE, Defendant, Flagship Mortgage Corp., respectfully requests that this Honorable Court enter an Order granting an extension of time to answer or otherwise plead up to and including March 21, 2008.

/s/ Paige M. Neel

PAIGE M. NEEL
CLAUSEN MILLER P.C.

CERTIFICATE OF SERVICE AND NOTICE OF ELECTRONIC FILING

The undersigned hereby certifies that she caused true and correct copies of the following:

1. Defendant, Flagship Mortgage Corp.'s Motion for Extension of Time

to be electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record on the 20th day of February, 2008.

/s/Paige M. Neel

Paige M. Neel

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